

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

ALLISON COLLIER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 2:07-cv-00922-MHT-CSC
	)	<b>JURY TRIAL DEMANDED</b>
UNIVERSAL FIDELITY LP, a foreign	)	
limited partnership, HSBC BANK NEVADA,	)	
N.A., a foreign company, and NATIONAL ASSET	)	
RECOVERY, INC., a foreign corporation,	)	
	)	
Defendants.	)	

**REQUEST FOR ENTRY OF DEFAULT - DEFENDANT HSBC BANK NEVADA**

To the Clerk of the United States District Court:

Plaintiff hereby requests that the Clerk enter default in this matter against Defendant HSBC BANK NEVADA, N.A. (hereinafter referred to as "HSBC") on the ground that HSBC has failed to appear or otherwise respond to the Amended Complaint within the time prescribed by the *Federal Rules of Civil Procedure*. Certificate of Andy Nelms ¶ 5.

Plaintiff served the Summons and Complaint on HSBC on March 3, 2008, by Certified United States Mail, as evidenced by the proof of service on file with this Court. Id. ¶ 2. Plaintiff is informed and believes that HSBC is not an infant or incompetent person or in the military service. Id. ¶ 6.

Respectfully submitted this 22nd day of April, 2008.

By: /s/ Andy Nelms  
Keith Anderson Nelms  
Attorney for Plaintiff  
ASB-6972-E63K

Of Counsel:

Anderson Nelms & Associates, LLC  
847 South McDonough Street, Suite 100  
Montgomery, Alabama 36104  
(334) 263-7733 (Telephone)  
(334) 832-4390 (Facsimile)

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

ALLISON COLLIER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 2:07-cv-00922-MHT-CSC
	)	<b>JURY TRIAL DEMANDED</b>
UNIVERSAL FIDELITY LP, a foreign	)	
limited partnership, HSBC BANK NEVADA,	)	
N.A., a foreign company, and NATIONAL ASSET	)	
RECOVERY, INC., a foreign corporation,	)	
	)	
Defendants.	)	

**APPLICATION TO CLERK FOR ENTRY OF DEFAULT - HSBC BANK NEVADA**

The Clerk for the above-entitled Court will enter default against Defendant HSBC Bank Nevada, N.A. in the above cause for failure to plead, answer or otherwise defend in said cause as required by law.

By: /s/ Andy Nelms  
Keith Anderson Nelms  
ASB-6972-E63K

Of Counsel:  
Anderson Nelms & Associates, LLC  
847 South McDonough Street, Suite 100  
Montgomery, Alabama 36104  
(334) 263-7733 (Telephone)  
(334) 832-4390 (Facsimile)

Default entered:

By: \_\_\_\_\_  
Clerk / Chief Deputy

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

ALLISON COLLIER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 2:07-cv-00922-MHT-CSC
	)	<b>JURY TRIAL DEMANDED</b>
UNIVERSAL FIDELITY LP, a foreign	)	
limited partnership, HSBC BANK NEVADA,	)	
N.A., a foreign company, and NATIONAL ASSET	)	
RECOVERY, INC., a foreign corporation,	)	
	)	
Defendants.	)	

**CERTIFICATE**

I, Keith Anderson Nelms, declare:

1. I am an attorney at law licensed to practice before the Courts of the State of Alabama and this United States District Court. I am the attorney for the Plaintiff in the law firm of Anderson Nelms & Associates, LLC. Unless stated otherwise, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.
2. On February 15, 2008, Plaintiff filed her Amended Complaint in this case against three Defendants, including HSBC Bank Nevada, N.A. (hereinafter referred to as "HSBC"). By way of U.S. Certified Mail, Plaintiff perfected service of a Summons and Complaint upon HSBC on March 3, 2008. *See* Court Doc 10.
3. In excess of 20 days have lapsed since the date on which service of the Summons and Complaint was perfected as to HSBC.
4. Neither Plaintiff nor the Court has granted HSBC any extension of time to

respond to the Amended Complaint.

5. HSBC has failed to answer or otherwise respond to the Amended Complaint, or serve a copy of any answer or other response upon Plaintiff's attorney of record.
6. Information available to me indicates that HSBC is not an infant or incompetent person, and has not been in the military service of the United States since the filing of this action nor for a period of six months prior to such filing.

I certify, pursuant to 28 U.S.C. 1746(2), under penalty of perjury, that the foregoing is true and correct.

Respectfully submitted this 22nd day of April, 2008.

By: /s/ Andy Nelms  
Keith Anderson Nelms  
Attorney for Plaintiff  
ASB-6972-E63K

Of Counsel:  
Anderson Nelms & Associates, LLC  
847 South McDonough Street, Suite 100  
Montgomery, Alabama 36104  
(334) 263-7733 (Telephone)  
(334) 832-4390 (Facsimile)